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7 Attorney for Jaqueline Cammille Chorney

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAQUELINE CAMMILLE CHORNEY,

15 Defendant.

Case No. 2:16-mj-283-VCF

**STIPULATION TO EXTEND  
CONDITIONS OF RELEASE  
DEADLINE**  
(Second Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
18 United States Attorney, and Nadia Janjua Ahmed, Assistant United States Attorney, counsel for  
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi A.  
20 Ojeda, Assistant Federal Public Defender, counsel for Jaqueline Cammille Chorney, that the  
21 Court extend the time for her to resolve her outstanding warrant in Texas:

22 1. On April 25, 2016, Ms. Chorney appeared before the Court on her initial  
23 appearance on the Complaint. At that time, the Court allowed her release pursuant to certain  
24 conditions of release including satisfying any outstanding warrants within 60 days. PR Bond  
25 #6.  
26

1           2.       Since that time, Ms. Chorney has continued to save money in order to be able  
2 to afford this process, however, she has only been able to gain part-time employment, which  
3 has not allowed for her to save the necessary funds to satisfy her outstanding warrants as she  
4 has two children to provide for in addition to her basic living expenses. Ms. Chorney is  
5 continuing to seek full-time employment.

6           3.       Pursuant to the Court order, however, she only has until September 23, 2016 to  
7 satisfy this outstanding warrant (CR #12). Additional time is necessary to allow her to find full-  
8 time employment and to save up the \$5,000 for the attorney, the bail and her flights to Texas.

9           4.       Accordingly, Ms. Chorney requests the Court allow her an additional 60 days to  
10 satisfy her outstanding warrant from Texas. Neither the Government nor Pre-Trial oppose this  
11 request given Ms. Chorney's diligence so far.

12           This is the second request for a continuance.

13           DATED this 22<sup>nd</sup> day of September, 2016.

14  
15       RENE L. VALLADARES  
16       Federal Public Defender

      DANIEL G. BOGDEN  
      United States Attorney

17       /s/ Heidi A. Ojeda  
18       By \_\_\_\_\_  
19       HEIDI A. OJEDA  
      Assistant Federal Public Defender

      /s/ Nadia Janjua Ahmed  
      By \_\_\_\_\_  
      NADIA JANJUA AHMED  
      Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

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6 JAQUELINE CAMMILLE CHORNEY,

7 Defendant.

Case No. 2:16-mj-283-VCF

8 FINDINGS OF FACT, CONCLUSIONS  
9 OF LAW AND ORDER

10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. On April 25, 2016, Ms. Chorney appeared before the Court on her initial  
14 appearance on the Complaint. At that time, the Court allowed her release pursuant to certain  
15 conditions of release including satisfying any outstanding warrants within 60 days. PR Bond  
16 #6.

17 2. Since that time, Ms. Chorney has continued to save money in order to be able  
18 to afford this process, however, she has only been able to gain part-time employment, which  
19 has not allowed for her to save the necessary funds to satisfy her outstanding warrants as she  
20 has two children to provide for in addition to her basic living expenses. Ms. Chorney is  
21 continuing to seek full-time employment.

22 3. Pursuant to the Court order, however, she only has until September 23, 2016 to  
23 satisfy this outstanding warrant (CR #12). Additional time is necessary to allow her to find full-  
24 time employment and to save up the \$5,000 for the attorney, the bail and her flights to Texas.

